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*Counsel for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**CERTIFICATE OF NO OBJECTION  
UNDER 28 U.S.C. § 1746 REGARDING OMNIBUS  
CLAIMS OBJECTION SCHEDULED FOR HEARING ON DECEMBER 19, 2013**

TO THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures entered on June 17, 2010 [Docket No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, filed the following omnibus claims objection (the "Claim Objection") with the Court for hearing on December 19, 2013:

Four Hundred Forty-Sixth Omnibus Objection to Claims (No Liability Claims) [**Docket No. 40906**].

2. In accordance with the Second Amended Case Management Order, LBHI established a deadline of December 12, 2013 at 4:00 p.m. (the “Response Deadline”) for the Claim Objection for parties to object or file responses. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadline has now passed and, to the best of my knowledge, no responsive pleadings to the Claim Objection have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on LBHI’s counsel by any of the holders of the claims included in Exhibit 1 to the Order attached hereto, which includes only the proofs of claim for which the Claim Objection will be granted.

4. Accordingly, LBHI respectfully requests that the proposed order granting the Claim Objection annexed hereto as Exhibit A, which is unmodified since the filing of the Claim Objection, be entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: December 13, 2013  
New York, New York

**CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP**

By: /s/ L. P. Harrison 3rd  
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**EXHIBIT A**

**(Proposed Order – Docket No. 40906)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
<b>In re</b>	<b>: Chapter 11 Case No.</b>
	<b>:</b>
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	<b>: 08-13555 (JMP)</b>
	<b>:</b>
<b>Debtors.</b>	<b>: (Jointly Administered)</b>
-----X	

**ORDER GRANTING FOUR HUNDRED FORTY-SIXTH  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the four hundred forty-sixth omnibus objection to claims, dated October 30, 2013 (the “Four Hundred Forty-Sixth Omnibus Objection to Claims”),<sup>1</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to section 502(b) of the Bankruptcy Code, Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], seeking to disallow and expunge the No Liability Claims, all as more fully described in the Four Hundred Forty-Sixth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Forty-Sixth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Forty-Sixth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Four Hundred Forty-Sixth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

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<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Forty-Sixth Omnibus Objection to Claims.

ORDERED that the relief requested in the Four Hundred Forty-Sixth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the portions of the claims listed on Exhibit 1 annexed hereto that relate to the securities identified by ISIN XS0215349357 or ISIN XS0229269856 whether liquidated, unliquidated or undetermined, are disallowed and expunged with prejudice; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT 1**

OMNIBUS OBJECTION 46: NO LIABILITY CLAIMS

Pg. 8 of 8

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	AMOUNTS TO BE DISALLOWED
1 CITIBANK ESPANA, S.A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55402	'XS0229269856	\$373,486.00
2 CITIBANK PRIVATKUNDEN AG & CO. KGAA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55404	'XS0229269856	\$386,267.00 *
3 CITIBANK, N.A. SINGAPORE BRANCH	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55846	'XS0215349357	\$2,754,994.00 *
					'XS0229269856	\$1,199,985.00 *
						<u>\$3,954,979.00</u>
4 CITIBANK, N.A., HONG KONG BRANCH	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55845	'XS0229269856	\$1,136,080.00 *
					TOTAL	\$ 5,850,812.00

\* Plus unliquidated and/or undetermined amounts.